

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND  
(SOUTHERN DISTRICT)**

HAGERSTOWN RECOVERY LLC  
DBA THE VALLEY  
19120 MUNCASTER RD.  
DERWOOD, MD 20855,

Plaintiff,

v.

NEW SPIRIT RECOVERY LLC C/O  
ARTHUR KAZANCHIAN  
17856 CATHEDRAL PL  
ENCINO, CA 91316,

&

TREATMENT OUTREACH SERVICES  
INC. C/O JESSICA PHELAN  
1163 FERNLEA DR WEST PALM BEACH,  
FL 33417

&

JESSICA PHELAN-personally 1163  
FERNLEA DR WEST PALM BEACH, FL  
33417

&

POLARIS DETOX LLC DBA  
INNOVO DETOX  
7007 YORK RD.  
ABBOTTSTOWN, PA 17301

Defendants.

Case No.: 8:25-cv-01252-DKC  
Jury Trial Demanded

**DEFENDANT NEW SPIRIT RECOVERY LLC'S NOTICE OF MOTION TO DISMISS**

Defendant New Spirit Recovery LLC ("Defendant" or "NSR") hereby moves under Rule 12(b)(2) of the Federal Rules of Civil Procedure to dismiss Plaintiff Hagerstown Recovery LLC's ("Plaintiff") Amended Complaint because NSR is not subject to personal jurisdiction in Maryland

1 for the asserted claims. In the alternative, NSR moves under Rule 12(b)(6) to dismiss Plaintiff's  
2 Amended Complaint because it fails to allege a plausible claim for relief.

3 This Motion is based on the attached Memorandum of Points and Authorities and  
4 Declaration of Leshon Hill (filed concurrently herewith), and upon such oral argument and  
5 submissions that may be presented at or before the hearing on this motion.

6 WHEREFORE, Defendant NSR requests that the Court GRANT the Motion to Dismiss  
7 under Fed. R. Civ. P. 12(b)(2) because NSR is not subject to personal jurisdiction in Maryland for  
8 the asserted claims, or alternatively under Fed. R. Civ. P. 12(b)(6) on the grounds that the Amended  
9 Complaint fails to state a plausible claim for relief against NSR.

10  
11 Respectfully submitted,

12 DATED: June 18, 2025

WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP

13  
14 By: /s/ Paulo A. de Almeida

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18 By: /s/ Jeannette M. Carmadella  
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23 Counsel for Defendant,  
24 New Spirit Recovery LLC  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 18th day of June, 2025, a copy of the foregoing document was electronically delivered to:

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By: /s/ Paulo A. de Almeida  
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